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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
NAPOLEAN TEWOLDE, LORRAINE DORNICK, :
ADAMA SAYE WILSON, EDWIN J. ANDRADE, :
AMINE OUACHER, Individually and on Behalf of All : ECF
Other Persons Similarly Situated, : 17 Civ. 2687 (RA)(KHP)
:
Plaintiffs, :
:
-against- :
:
FLAVOR BOUTIQUE 796 INC., FLAVOR BOUTIQUE :
522 INC., 392 CPW LLC, MICHAEL FRIEDLANDER, :
and JOHN DOES #1-10, :
:
Defendants. :
-----X

**DECLARATION OF WILLIAM C. RAND
IN SUPPORT OF APPROVAL OF SETTLEMENT**

EXHIBIT A

**FULLY EXECUTED
STIPULATION OF SETTLEMENT**

Dated: New York, New York
January 16, 2018

William C. Rand, Esq.
Law Office of William Coudert Rand
501 Fifth Avenue, 15th Floor
New York, New York 10017
Tel: (212) 286-1425
Attorney for Plaintiffs

Stipulation of Settlement

general

(1) mutual releases

(2) \$3,500 to each of 5 Plaintiffs = \$ ~~17,500~~ 17,500

(3) Fees + Expenses of \$5410

\$22,910

(4) Additional Damage of \$10,000
if default after 7 day notice
+ cure period - notice is to
counsel in writing.

(5) Payment Timing
~~1/2~~ 1/2 within 7 days of court
approval

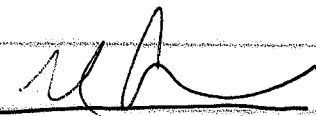
1/4 6 months after approval

1/4 10 months after approval

Agreed

Defendant Michael Friedlander

Individually and on behalf
of corporate Defendants


name-signature

10/31/17
Date

Plaintiffs - Amine Ouacher

Lorraine Dornick

~~Dornick~~

Adama Wilson

Asayemba

Edwin Andrade

~~Andrade~~

Napoleon
Tewolde

Napoleon Tewolde